

Before the  
Federal Communications Commission  
Washington, D. C. 20554

In the Matter of

Additional Comment Sought on Non-Accredited  
Standard-Setting Organizations that Develop  
Standards for Public Safety Wireless  
Communications Equipment

WT Docket No. 96-86

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To: The Commission

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ADDITIONAL COMMENTS OF THE COUNTY OF ORANGE, CALIFORNIA

The County of Orange, California, respectfully submitted its comments on WT Docket No. 96-86, and herein respectfully submits its additional comments on the above captioned matter.

1. In its comments, the County submitted the following in paragraph 10.

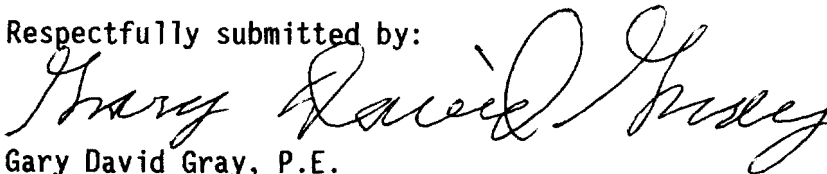
Believing in interoperability standards and the need for multiple-vendor sourcing of wireless systems and equipment for its Public Safety agencies, Orange County has supported and has participated through its representatives in the APCO Project 25 process since its inception in 1989. The County believes that this unique, user-driven standards process, and other user-driven which are similar in their development, are the only way to assure that the needs of the Public Safety user community are truly reflected in the standards--not merely what is most convenient for the manufacturing interests. The development of Public Safety standards requires the participation of all interests, including manufacturing interests, as was the case with the APCO Project 25 process, but a user-driven process is absolutely essential to the success of such a process for the wireless systems and equipment which supports the nation's Public Safety agencies at all levels.

2. Since the County did not participate in the preparation of the text of Section 273 (d) (4) of the Communications Act of 1934, as amended, it is not comfortable in commenting on the applicability of the requirements of this Section to non-accredited standards-setting organizations that develop standards for Public Safety wireless communications equipment. Instead, it respectfully submits the insight it has as a major Public Safety wireless communications system operator relative to standards.
3. The County has long been in support of user-driven interoperability standards for Public Safety wireless communications systems and equipment. Orange County participated in the original APCO Project 16 series, which became the basis for today's Public Safety-grade of trunked, wireless communications systems. Motorola and Ericsson, as examples, both proudly advertise that they have developed and implemented many such APCO Project 16-compliant systems throughout the world.

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4. The standards product of the user-driven APCO Project 16 process described the operational requirements of Public Safety-grade trunking systems, but stopped short of specifying technical interoperability, since trunking was a relatively new technology for the two-way wireless industry. This is similar to the Federal Government's approach to its Digital Encryption Standard (DES), which described the requirements for the standard but stopped short of specifying technical interoperability. While both APCO Project 16 and the Federal Government's DES have received some level of criticism throughout their existence for their lack of specifying a requirement for technical interoperability, regardless of the validity for the reasons which led to the respective decisions not to specify such requirements, systems and equipment meeting both standards are in high use by the nation's Public Safety agencies today.
5. Orange County remains strongly convinced that interoperability standards are vital to the successful operations of Federal, state, and local Public Safety agencies, and that such standards are certainly essential for second-sourcing equipment and for system expansions once a system is initially implemented. The County has continued to be actively involved in the user-driven standards process throughout the APCO Project 25 process for the new digital generation of Public Safety wireless communications equipment. "User-driven" is not to say that users alone have been seeking to develop the APCO Project 25 standards in a vacuum. Rather, this has truly been an open and fair process in which the Public Safety user community has sought out participants from all levels of government, consultants, and academia, in addition to the wireless manufacturing community.
6. The County believes that it is of paramount importance to the well-being of the Public Safety community to assure that such standards truly reflect the needs of the Public Safety users, as opposed to the majority of standards-setting processes which appear to be developed solely by research and manufacturing interests which "determine" the needs of the user from their own parochial viewpoints.
7. In summary, Orange County does not believe that the key to the success of a standards-setting organization for Public Safety wireless communications equipment lies in accreditation versus non-accreditation, but in an open and fair process which assures that the standards produced truly reflect the needs of the Public Safety users which the standards purport to represent.

Respectfully submitted by:



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October 10, 1996